

METHANE:

- EPA took comment on a two year stay meant to alleviate compliance obligations associated with the new source performance standard for oil and gas operations (sometimes referred to as the Methane Rule or OOOO(a)).
- The comment period closed on August 9 for the initial proposal. Now pending at OMB is a supplemental notice that clarifies EPAs legal authority for this action.
- Because the 2-year stay triggers a 60-day effective date delay (due to the congressional review act), a short term 90-day stay is also pending at OMB that can go into effect sooner and help alleviate the gap.
- OECA is managing any potential enforcement concerns from EPAs purview to ensure no contradictory actions are taken.
- Regarding the substance of the Methane Rule, EPA technical staff is working with stakeholders to better asses how the oil and gas chain of operation should be separated into a number of source categories (de-aggregating) and then determining whether a VOCs-only standard is the most appropriate course of action.